## UNITED STATES DISTRICT COUOURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

CHARLES ROTHMAN,	)	
Plaintiff,	)	
v.	)	No. 4:11-CV-639 (CEJ)
CHARLES CHASTAIN, et al.,	)	
Defendants.	)	

## **UNOPPOSED MOTION FOR EXTENSION OF TIME**

Plaintiff, through his undersigned counsel, hereby moves the Court for an extension of time in which to amend his complaint, stating as follows:

- 1. On May 3, 2012, this Court entered a scheduling order in this case.
- 2. Pursuant to the scheduling order, Rule 26 disclosures were due on June 4, 2012.
- 3. Pursuant to the scheduling order, the deadline for amending the pleadings was June 15.
- 4. On May 8, 2012, the Court appointed a second attorney to represent Plaintiff in this matter.
- 5. Plaintiff is still awaiting information from Defendant Kyle Webb concerning persons with knowledge of his claims, so that all responsible parties may be joined to this action.
- 6. Plaintiff's counsels also need additional time to coordinate their efforts to ensure any amended complaint filed with the court is properly and adequately pleads all of Plaintiff's causes of action.
  - 7. Defendant Kyle Webb consents to the present motion.
  - 8. Defendant Charles Chastain consents to the present motion.

WHEREFORE, Plaintiff respectfully requests an extension of time to and including July 6, 2012, for Plaintiff file an amended complaint.

Respectfully submitted,

## /s/ Jason C. Bache

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## **CERTIFICATE OF SERVICE**

On this 22<sup>nd</sup> day of June, 2012, a true and accurate copy of the foregoing was electronically filed with this Court and a copy served through the Court's electronic filing system to all counsel of record in the subject matter.

Rex P. Fennessey Assistant Attorney General Old Post Office Building P.O. Box 861 St. Louis, MO 63188 Attorney for Defendant Webb

Jessica Liss Chanekka Buckingham Jackson Lewis LLP Two CityPlace Drive, suite 200 St. Louis, MO 63141 Attorneys for Defendant Chastain

/s/ Jason C. Bache